

Presentment Date and Time: December 13, 2022 at 10:00 a.m. (Eastern)
Objection Deadline: December 12, 2022 at 5:00 p.m. (Eastern)

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Counsel for Jonathan L. Flaxer, Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
JOSEPH KLAYNBERG,	: Case No. 22-10165 (MG)
	:
Debtor.	:
	:
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**NOTICE OF PRESENTMENT OF APPLICATION OF THE CHAPTER 11 TRUSTEE FOR
ORDER DIRECTING EXAMINATIONS AND PRODUCTION OF DOCUMENTS
PURSUANT TO BANKRUPTCY RULES 2004 AND 9016 AND CIVIL RULE 45**

PLEASE TAKE NOTICE that Jonathan L. Flaxer, the chapter 11 trustee (the “**Trustee**”) for the estate of the above-captioned debtor (the “**Debtor**”), through his undersigned counsel, will present the attached Application and proposed Order Directing Examinations and Production of Documents Pursuant to rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure 2004 and 9016 and Rule 45 of the Federal Rules of Civil Procedure, for signature to the Honorable Martin Glenn, Chief United States Bankruptcy Judge of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **December 13, 2022 at 10:00 a.m. (prevailing Eastern Time)** in accordance with Local Bankruptcy Rule 9074-1(b).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Stipulation and Order

must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefor, and must be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers of the Honorable Martin Glenn), and any objection must further be served upon: (i) Golenbock Eiseman Assor Bell & Peskoe LLP, Counsel for the Trustee, 711 Third Avenue, 17th Floor, New York, New York 10017 (Attn: Michael S. Weinstein, Esq.); (ii) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014; and (iii) all other parties entitled to service in the above-captioned cases, so as to be received no later than **December 12, 2022 at 5:00 p.m. (prevailing Eastern Time)**. **Unless objections are received by that time, there will not be a hearing, and the proposed Order may be signed.**

Dated: New York, New York
November 29, 2022

GOLENBOCK EISEMAN ASSOR BELL
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By: /s/ Michael S. Weinstein
Michael S. Weinstein
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